

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

IN RE: RANBAXY GENERIC DRUG
APPLICATION ANTITRUST
LITIGATION

MDL No. 2878

THIS DOCUMENT RELATES TO:

All Direct Purchaser Actions

Master File No.
19-md-02878-NMG

**DECLARATION OF THOMAS M. SOBOL IN SUPPORT OF
DIRECT PURCHASER PLAINTIFFS' UNOPPOSED MOTION FOR PRELIMINARY
APPROVAL OF PROPOSED SETTLEMENT, APPROVAL OF THE FORM AND
MANNER OF NOTICE, APPOINTMENT OF SETTLEMENT ADMINISTRATOR
AND ESCROW AGENT, AND SETTING THE FINAL SETTLEMENT SCHEDULE
AND DATE FOR FAIRNESS HEARING**

I, Thomas M. Sobol, state under pains and penalties of perjury as follows:

1. I am a partner in the law firm of Hagens Berman Sobol Shapiro LLP based in its Boston office. I am licensed to practice in the state of Massachusetts. I am over 21 years of age and am not a party to this action. I make this declaration based on my own personal knowledge. If called upon to testify, I could and would testify competently to the truth of the matters stated herein.

2. I provide this declaration in support of the Direct Purchasers' Unopposed Motion for Preliminary Approval of Proposed Settlement, Approval of the Form and Manner of Notice, Appointment of Settlement Administrator and Escrow Agent, and Setting the Final Settlement Schedule and Date for Fairness Hearing.

3. I was appointed by the Court as Co-Lead Counsel for the Direct Purchaser Classes in this action.

4. All representatives of the Direct Purchaser Classes approve of and fully support the proposed settlement.

5. I attach the following documents referenced in the Direct Purchasers' supporting memorandum:

- a. Attached as **Exhibit 1** is a true and correct copy of the Settlement Agreement between the Direct Purchaser Plaintiffs and Ranbaxy.
- b. Attached as **Exhibit 2** is a true and correct copy of the Proposed Class Notice to the Direct Purchaser Settlement Classes (Exhibit B to the Settlement Agreement).
- c. Attached as **Exhibit 3** is a true and correct copy of a proposed order granting preliminary approval of the settlement (Exhibit A to Settlement Agreement).
- d. Attached as **Exhibit 4** is a true and correct copy of the Escrow Agreement between Lead Class Counsel and proposed Escrow Agent, The Huntington National Bank (in a form similar to Exhibit D to Settlement Agreement).
- e. Attached as **Exhibit 5** is a true and correct copy of the Direct Purchaser Plaintiffs' proposed Plan of Allocation.
- f. Attached as **Exhibit 6** is a true and correct copy of the Declaration of Joseph Meltzer, Allocation Counsel for the Diovan Class.
- g. Attached as **Exhibit 7** is a true and correct copy of the Declaration of Linda Nussbaum, Allocation Counsel for the Nexium Class.
- h. Attached as **Exhibit 8** is a true and correct copy of the Declaration of Kenneth A. Wexler, Allocation Counsel for the Valcyte Class.
- i. Attached as **Exhibit 9** is a true and correct copy of the Declaration of Meredith Rosenthal, Ph.D. Related to the Proposed Allocation Plan and Net Settlement Fund Allocation.

- j. Attached as **Exhibit 10** is a true and correct copy of the Declaration of Amy Fringer Regarding the Qualifications and Settlement Notice Plan of Rust Consulting, Inc.
- k. Attached as **Exhibit 11** is a true and correct copy of the Boston Office resume of Hagens Berman Sobol Shapiro LLP.
- l. Attached hereto as **Exhibit 12** is a true and correct copy of the firm resume of Hilliard & Shadowen LLP.

Executed April 22, 2022 under the pains and penalties of perjury.

/s/ Thomas M. Sobol

Thomas M. Sobol

Co-Lead Counsel for the Direct Purchaser Classes